

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

TIANNA KOTCHMAR, on behalf of herself and all others similarly situated,)) Civil Action No.: 15-cv-04061
))
Plaintiff,))
))
v.))
))
MOVIE TAVERN PARTNERS, LP, <i>et al.</i> ,))
))
Defendants.))
))

**PLAINTIFF'S MOTION FOR FINAL APPROVAL
OF CLASS AND COLLECTIVE ACTION SETTLEMENT, CERTIFICATION
OF SETTLEMENT CLASS, AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES AND SERVICE PAYMENT TO PLAINTIFF**

Plaintiff Tianna Kotchmar respectfully requests that the Court enter an Order: (i) granting final approval of the class action settlement; (ii) certifying the Settlement Class; (iii) approving the Service Payment award to Plaintiff; (iv) granting Class Counsel's requested award of attorneys' fees and expenses; and (v) such further and other relief as this Court deems just and proper. Plaintiff is submitting a proposed Final Order attached hereto. In further support of this Motion Plaintiff is contemporaneously filing the following:

- (1) Memorandum of Law in Support in Support of Plaintiff's Unopposed Motion for Final Approval and Certification of Settlement Class;
- (2) Memorandum of Law in Support of Plaintiff's Motion for Attorneys' Fees, Reimbursement of Expenses, and Service Payment to Plaintiff; and
- (3) Declaration of Gerald D. Wells, III in Support of Plaintiff's Motion for Final Approval of Class and Collective Action Settlement, and exhibits thereto.

By Order entered on March 4, 2016 the Court scheduled the hearing on this Motion for June 24, 2016, at 8:30 a.m. in Courtroom 5D, United States District Court for the Eastern District

of Pennsylvania, 601 Market Street, Philadelphia, Pennsylvania 19106. At that time, Class Counsel shall be prepared to present oral argument in support of this motion.

Dated: May 25, 2016

Respectfully submitted,

CONNOLLY WELLS & GRAY, LLP

/s/ Gerald D. Wells, III

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*Counsel for Plaintiff and the
Proposed Settlement Class*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of May 2016, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Gerald D. Wells, III
Gerald D. Wells, III